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new

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Drug Enforcement Administration

REPORT OF INVESTIGATION

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1. Program Code	2. Cross File	Related Files	3. File No. [REDACTED]	4. G-DEP Identifier
5. By: DI Linda Stocum At: Orlando District Office	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. File Title PUBLIX WAREHOUSE	
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. Date Prepared 09-10-08	
9. Other Officers: DI Deborah George				
10. Report Re: Cyclic, Publix Warehouse, 1950 Sand Lake Road, Bldg.3, Orlando, Florida 32809 RP0331924 [REDACTED]				

SYNOPSIS

This investigation was initiated pursuant to the FY-2008 Investigative Workplan, Orlando District Office, Diversion Control Group. PUBLIX WAREHOUSE, 1950 Sand Lake Road, Bldg. 3, Orlando, Florida 32809 is registered with the DEA as a distributor in schedules III, IIIN, IV and V, DEA number RP0331924, expiration 03/31/09 (Enclosure 1).

The on-site investigation took place on 09-04-08 and 09-08-08.

While the firm was not cited for any recordkeeping or security violations, recommendations were made at the closing discussion held at the Orlando District Office on 09-08-08 relative to the firm's adjustment records and their reserved/selection records. Suggestions were made to make these records more comprehensive.

Since no further action is anticipated, this case is closed.

11. Distribution: Division	12. Signature (Agent) Linda A. Stocum	13. Date
District	14. Approved (Name and Title) Randy L. Rine Group Supervisor	15. Date
Other [REDACTED]		

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ENCLOSURES

1. Notice of Inspection
2. Articles of Incorporation
3. State Licenses
4. Computation Chart
5. Closing Inventory
6. Receipt Records
7. Sales Records
8. Building and Cage Diagram
9. ADT Contract

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DETAILS:**C. BASIS FOR INVESTIGATION:**

This in-depth investigation was initiated in accordance with the Orlando District Office Diversion Workplan for FY-2008. PUBLIX WAREHOUSE, 1950 Sand Lake Road, Bldg. 3, Orlando, Florida 32809, is registered with the DEA as a distributor in schedules III, IIIN, IV and V, DEA number RP0331924, expiration 03/31/09.

D. SUBJECT FIRM BACKGROUND:

1. General: PUBLIX WAREHOUSE, hereafter referred to as PUBLIX, is a wholesale distributor located at 1950 Sand Lake Road, Bldg. 3, Orlando, Florida 32809. The firm has occupied the current location for 15 years with the new addition of a pharmacy warehouse in 2004. PUBLIX Supermarkets, Inc. is an employee owned retail grocery supermarket. PUBLIX employs more than 132,000 associates and operates 949 supermarkets in five states. The firm distributes exclusively to its 731 pharmacies in Florida, Alabama, Tennessee, Georgia and South Carolina. PUBLIX was incorporated in the State of Florida in 1927, corporation #112252. The main branch headquarters office is located at George Jenkins Building, P.O. Box 32024, Lakeland, Florida 33802. PUBLIX has one pharmacy distribution center in the United States. A copy of the Articles of Incorporation is Enclosure 2. There are four retail divisions: Miami, Jacksonville, Lakeland and Atlanta. Each division is led by a Division Vice President. The firm is governed by a ten member Board of Directors.

The corporate officers are:

Name	Title	DOB	SSN
William E. Crenshaw	President	[REDACTED]	[REDACTED]
Charles H. Jenkins Jr.	CEO		
John A. Attaway Jr.	Vice President		
David P. Phillips	CFO		

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Principal Management is as follows:

<u>Name</u>	<u>Title</u>	<u>DOB</u>	<u>SSN</u>
Mike Lester	Distribution Mgr.	[REDACTED]	[REDACTED]
Jason Bamberger	Department Manager	[REDACTED]	[REDACTED]
Stephanie Bronson	Quality Assurance	[REDACTED]	[REDACTED]
Priscella Miller	Lead Person	[REDACTED]	[REDACTED]
Brandy Gillenwater	Administrative	[REDACTED]	[REDACTED]

A check in NADDIS revealed no derogatory information. Mr. Crenshaw is listed as a Publix Executive [REDACTED] Mr. Jenkins is listed as a Publix Executive [REDACTED] Mr. Attaway is listed as a Publix Vice President [REDACTED] Mr. Phillips is listed as a Publix Executive [REDACTED] Ms. Harper is now Ms. Bronson and is listed as a Publix Quality Assurance Manager [REDACTED]

The PUBLIX Warehouse employs 33 full time employees. The business hours are 5:30am to 4:00pm, Monday through Thursday. The percentage of the firm's controlled substances is approximately 7%. The firm also employs 150 employees at a grocery distribution warehouse on site. The grocery distribution center deals with PUBLIX grocery stores only.

2. Registrations and Licenses:

The firm holds the following licenses/registrations (Enclosure 3):

- a. State of Florida, Department of Health Drugs, Devices and Cosmetics Permit # 22:01471, expiration 09/30/08
- b. Florida, Certificate of Occupancy, Permit #93-030640
- c. State of Georgia, Wholesaler Pharmacy, Permit #PHWH002174, expiration 06/30/09
- d. State of Alabama, State Board of Pharmacy, Permit #193258, expiration 12/2008

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e. State of Tennessee, Board of Pharmacy, Manufacturer, Wholesaler, Distributor, ID #0000002343, expiration 09/30/09

f. South Carolina Department of Labor, Licensing and Regulation, Board of Pharmacy, Non Resident wholesale, Distributor, Manufacturers Permit #70-008528, expiration 06/30/09

3. History:

a. [REDACTED] Approval of Application, Distributor in schedules III, IIIN, IV, and V dated 12/05/05.

E. PERSONS INTERVIEWED AND INDIVIDUAL RESPONSIBILITY:

On 09-04-08 Investigators Linda Stocum and Deborah George conducted an on-site inspection at the PUBLIX Distribution Center, 1950 Sand Lake Road, Bldg 3, Orlando, FL 32809. During this meeting Investigators met with and presented credentials to Quality Assurance & Inventory Specialist, Stephanie BRONSON.

The purpose of this meeting was to conduct an onsite inspection and acquire requested information regarding the firm's physical, procedural and personnel security.

F. SCOPE OF INVESTIGATION:

The scheduled in-depth investigation was initiated on 09-04-08 and completed on 09-08-08. The controlled substances accountability period extended from 06-30-06 (BOB) through 09-04-08 (COB) for schedules III, IIIN, IV, and V. The Investigators were assisted by Quality Assurance & Inventory Specialist, Stephanie BRONSON and Orlando Pharmacy Department Manager, Jason BAMBERGER. The following controlled substances were selected for the accountability audit based on the quantities handled and potential for abuse:

<u>Controlled substance</u>	<u>Size</u>	<u>Schedule</u>
Butalbital, Acetaminophen, Caffeine	100ct.	III
And Codeine Phosphate		

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50mg, 325mg, 40mg, 30mg

Hydrocodone, APAP 10/750mg	100ct.	III
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Diazepam 10mg	100ct.	IV
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Alprazolam 2mg	100ct.	IV
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Cheratussin AC SF	480ml	V
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APAP, Codeine Oral Sol	5ml	V
Acetaminophen & Codeine		
Phosphate Oral Solution		
120mg/12mg/5ml		

Accountability: The audit revealed very small deviations. The results of the controlled substances audit are shown on the enclosed computation chart (Enclosure 4). The firm had discrepancies with two drugs: Diazepam 10mg +.46% and Cheratussin AC SF +.23%. All other audited drugs had no discrepancies. It should be noted that the firm printed the "Inventory Transaction History Report" for each of the drugs selected for audit. The firm also supplied documentation for adjustments on all III-V products audited. The Investigators asked to see supporting paperwork justifying the adjustments and were provided with supplier invoices, store invoices, transaction summary reports and corporate memos. The following records were used to conduct the audit:

1. 06-30-06 Initial Inventory BOB
2. 09-04-08 Closing Inventory COB
3. Sales invoices
4. Purchase invoices
5. Acquisition and Distribution Logs
6. Credit Memos
7. Computer-generated "Transaction Summary Report"
8. Computer-generated "Inventory/Billing History Report"
9. Freight Bills
10. Tickets/picking slips for customers
11. Inventory Adjustment Reports

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G. RECORD KEEPING:

During the on-site meeting, the Investigators were informed that Ms. BRONSON is responsible for all DEA recordkeeping and Mr. BAMBERGER is the point of contact for reports and reporting requirements. Ms. BRONSON was aware that records must be maintained for a period of two years in a readily retrievable manner, separate from other business records. Ms. BRONSON stated that PUBLIX controlled substance records are kept for a period of three years. The firm will not be handling any schedule II controlled substances. Division Loss Prevention Manager, Ron AVERITTE is responsible for the firm's security procedures. The mainframe computer is located at the corporate office in Lakeland, Florida.

1. Initial Inventory: The initial inventory was taken 10-05-05 BOB and filed in the firm's controlled substances cage. Publix Initial Inventory was signed off by Mr. BAMBERGER and Ms. BRONSON.

2. Biennial Inventory: The firm's last biennial inventory was taken 06-30-08.

3. Closing Inventory: Investigators Stocum and George took a physical inventory of the controlled substances to be audited with the assistance of Ms. BRONSON. The closing inventory period was 09-04-08. The physical count matched PUBLIX computer read-out of what was on hand. Ms. BRONSON attested to the accuracy and completeness of the closing count (Enclosure 5).

4. Receipts: The primary receipt record is the computer generated transaction report maintained on a computer database. The transaction reports show the product name; strength; size; invoice and purchase order; quantity; date received; transaction date; and store identification. The original purchase records for Schedules III - V are maintained in a file stored in the controlled substances cage. The purchase invoice contains the name of the firm, order number, quantity, product description and the date received. The invoice is attached to all other paperwork pertaining to the purchase of controlled substances, including PUBLIX purchase order, the vendor's shipping list, a freight bill prepared by PUBLIX and a freight log. An example of this packet is included as Enclosure 6. The

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firm utilizes a computer-generated report to record all controlled substances transactions. These records were cross checked utilizing the original purchase invoices. All of the required records were readily retrievable and kept separate from all other business records.

5. Production Records: Nothing to report.

6. Distribution Records: The primary record for Schedule III-V distributions is the firm's computer generated invoice (pick slip) and the actual manifests, which are maintained by date and stored in the IS Department. All original hard copies go to the PUBLIX store the controlled substances are shipped to. The invoices are generated based upon the PDX (retail pharmacy computer system) computer orders transmitted to the Distribution Center from the individual pharmacies. Enclosure 7 is a sample sales invoice.

7. Records of Returned or Damaged Goods: Damaged or expired goods that are received from the supplier will be returned to the supplier and a credit memo generated or the products will be destroyed using an authorized destruction facility. The firm does not accept returns from their stores. All stores are internally equipped to handle the disposition of controlled substances in their possession. The returns documents and credit memos are filed in the quarantine cage. The firm utilizes the quarantine cage to store substances that are in a holding status pending destruction or return. The drug destruction company the firm uses is MEDTURN, CLS Company, 4332 Empire Road, Fort Worth, Texas 76155, telephone 800-967-5952.

8. ARCOS: The firm submits the ARCOS report monthly in electronic format. According to computer based ARCOS, the last report submitted is dated 07-31-08 by Publix employee Brian Dearwater. All hardcopy ARCOS records and receipts are stored at the corporate office in Lakeland, FL.

9. QUOTAS: Nothing to report.

H. SECURITY:

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1. Structure and Location: PUBLIX is located in an industrial park area on the South side of Orlando, FL. The Pharmacy Warehouse is building number 3 and is a freestanding one story building that can only be reached through a guard station. The building is constructed of block concrete reinforced with steel cables and measures approximately 29,000 square feet. The roof is constructed of 1 ½ inch metal standard decking, 4 ½ inch freezer insulation, and 1 inch rigid insulation decking, covered with tar and gravel. The firm used to be a boxed meat facility, built for refrigeration. The firm is located in a low crime area. In the event of an alarm, the Orange County Sheriff's Department will respond with response time estimated at 5 minutes or less. There is a small entry hatch on the roof of the pharmacy warehouse building with a magnetic contact switch and plastic seals on the door that are checked monthly. The hatch leads to the paper recycling area.

2. Perimeter Security: There are four main buildings on the site: grocery products, paper products, pharmacy warehouse and paper recycling, and the garage facility. The firm is surrounded by an 8 ft. galvanized chain link fence with wire on top, with access limited to a gate located beyond the guard station. Visitors are issued a pass after the appropriate member of the firm is contacted for approval. The main entrance faces east, and consists of a glass door set in a metal frame. There is one fire exit door constructed of metal and seven metal overhead doors located in the shipping and receiving areas. All doors are equipped with magnetic contact switches. The overhead doors are secured by sliding locks and padlocks, and additional alarm coverage utilizing a microwave sensor. A diagram of the warehouse floor plan provided by the firm is included as Enclosure 8. The firm has exterior lighting located around the entire facility, and the parking lot has street lights as well. There is an alarm sounder and strobe light on the exterior of the building. Two cameras are mounted on the outside of the warehouse pharmacy on the front east side of the building.

3. Controlled Substance Security: The firm's Schedule III-V controlled substances are stored in a cage located at the north end of the warehouse. The cage has three solid walls and one caged wall. Two of the walls are constructed with 12 inch concrete block and one wall is constructed of 26 gauge steel skin and a 6 inch thick insulated wall panel. The front of the

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cage is constructed of 10 gauge steel mesh material, with approximately 2 X 1 inch openings. The horizontal steel bars are 57 inches apart and 2 ½ inches in diameter. The vertical steel square tube posts are 4 ft apart and 2 ½ inches in diameter. The vertical bars are bolted and brazed at all points to the concrete floor. The cage measures 36 ft deep, 30 ft high and 30 ft wide. The cage ceiling and cage door are constructed of the same black 10 gauge steel wire mesh. Entry to the cage requires a key and card access. When an employee is terminated all keys and access cards are collected.

The cage door has a magnetic contact switch. The cage extends to the building's perimeter walls on the north and west sides. The cage door, measuring 5' wide X 10' high, is of like construction and is located at the south end of the cage. The door is self-closing and self-locking, has a deadbolt lock and is equipped with a contact switch. Alarm security in the cage is provided by a wide angle video camera located at the south end of the cage, as well as two 360 degree motion detectors located on the east side of the cage. There is a second sliding gate on the east side of the cage, measuring 2'8" X 8', which is protected by a contact switch. The cage is under a separate alarm zone. The cage also has one roll up door on the west wall used for palletized controlled substances. Permission must be granted by authorized personnel prior to use. The roll up door is alarmed with a magnetic contact switch and key lock. There is a 360 degree motion detector located immediately outside the cage. Also outside the cage is a paper recycling area with a conveyor belt system and small door used for recycled card boxes. During hours of operation the conveyor door is open. The door leads to the recycling machine located in the recycling area and is 20ft off the ground. After business hours the door is sealed with a slide lock. The door is also alarmed with a magnetic contact switch and a motion detector mounted for complete door coverage. There are also three cameras mounted in the recycling area.

In addition to the schedules III - V controlled substances cage there is a quarantine cage. The quarantine cage is used for non-saleable and damaged items. The quarantine cage is located at the far south end of the warehouse. The cage is free standing and measures 14ft high, 24ft wide, and 25ft deep. The cage is bolted to the concrete floor and all nuts are brazed. The cage has a large sliding door next to a small man door. Both

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are constructed of 10 gauge steel mesh material. The sliding door is hinged and has sliders with a pad lock and contact switch. The main door is hinged with a self closing and self locking mechanism. The door also contains a magnetic contact switch and key lock. Access to the quarantine cage requires an access card and access code. The arming system is mounted on the outside of the cage. There are two cameras that cover the entire quarantine cage area. Ms. BRONSON and Mr. BAMBERGER are the only individuals with access to the quarantine cage. The cage has one motion detector located inside the cage providing complete coverage. The cage openings are 2 X 1 inches and the vertical posts are 2 ½ inches in diameter and mounted 57 inches apart.

5. Alarm Security: The firm's security system was installed by ADT Security Services and is monitored by ADT Security Services INC., 14200 E. Exposition Blvd, Aurora, CO 80012. All equipment was purchased from ADT, who maintains and repairs the equipment. ADT installed a BOSCH D7412G digital alarm communicator and TELGARD TG300 cellular system. The system is rated as a UL Grade A commercial burglary system. The system has a 24 hour battery backup installed and runs a self test once every twenty four hours. The master control unit is located in the main entrance security area in the pharmacy warehouse. A copy of the alarm system contract is included as Enclosure 9. On 09-04-08 Investigators Stocum and George conducted an alarm test and checked with the central station to confirm that the alarm signals were received accurately. The zone verifications were confirmed by ADT Security Company Operator 38226. PUBLIX employs security personnel to man the security office and guard station during business hours and the guard station 24 hours a day. All alarm signals are received at the security office and the monitoring station. Security personnel monitor all security cameras during business hours. Cameras also record information and is maintained for 60 days.

6. Personnel Security: The firm employs approximately 33 individuals. All employees and customers must enter through the front guard station and through the main entrance. The main entrance opens into a security station. The pharmacy warehouse is building number 3. There is a camera installed in the main entrance area. The interior door is locked at all times and separates the office area from the warehouse. All employees enter through a main entrance, scanning their photo ID badges for

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electronic confirmation. The entrance is monitored by security personnel. Security personnel conduct periodic walkthroughs of the facility. Employee movements throughout the warehouse are monitored by security personnel via a closed circuit camera system which is digitally recorded and reviewed with 60 day recall. Guests check in at the guard station where the PUBLIX representative is notified. Once PUBLIX personnel have been contacted, the individual is provided a parking pass and visitor's badge and sent to the main building number 1. Visitors are met at the main building entrance area and escorted to the pharmacy warehouse (building #3), where a second visitor's badge is issued and all personal items are stored in a designated locker.

7. Access to Controlled Substances: The following individuals have access to the controlled substances cage and storage areas:

<u>Name</u>	<u>Title</u>	<u>DOB</u>	<u>SSN</u>
Jason Bamberger	Department Manager	[REDACTED]	[REDACTED]
Stephanie Barton	Quality Assurance		
Mike Lester	Distribution Mgr.		
Priscella Miller	Lead Person		
Laura Andrade	Inventory Control		
Ronald Burton	FlowRack Selector		
Thad Dixon	Order Checker		
Tisha Campos	Order Checker		
Sandra Miller	Stocker		
Michael Bowman	Putaway		

A check in NADDIS revealed no derogatory information.

The corporate office conducts reference and background checks on all prospective employees. The corporate office uses American Background Incorporated, the contact for Publix is Joe Doyle, #919-359-2097, to conduct these checks. Additionally, new employees are subject to drug screening. All prospective employees are interviewed at the pharmacy warehouse site and the human resources department at the corporate office receives a recommendation from the warehouse staff regarding the hiring of prospective pharmacy warehouse personnel.

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7. Procedural Security:

a. Controlled Substances Shipping: The corporate office completes the order request by forecasting orders based on computer analysis of the last three months. All PUBLIX pharmacies utilize the PDX software system to order controlled substances from the pharmacy distribution center. PUBLIX projects that by late 2009 they will convert all their pharmacies to Enterprise. The Enterprise system will allow all PUBLIX pharmacies access to what customers are receiving at other PUBLIX stores.

The warehouse buyer accepts or rejects the order from its stores based on trends and events. The firm generates pick slips via an interactive voice system, for use by warehouse personnel to fill orders. The cage is locked unless an authorized person is inside. The distribution of each controlled substance is inventoried, cross checked and inspected prior to shipping. Each distribution is documented and tracked in the firm's computer system by product number. All controlled substances orders are pulled and checked by at least 3 individuals before being placed in totes and transferred to the shipping dock. The individuals are identified as a Selector, Order Checker and Dock Coordinator. All three individuals must verify the count before items are shipped.

The firm utilizes an interactive voice system when picking substances for delivery. The picker wears a wireless headset that is connected to a voice system. Once the picker receives the order, the computer generates a screen line for the same invoice. The picker logs on and begins picking. Once each item is picked it must be scanned by the picker and placed into a tote. If the item does not match the computer data, an error message is displayed and a voice message is relayed to the operator to choose the correct item. The scan code is based on the NDC number. The computer will not allow an invoice to be printed and closed until the error has been corrected. A person validates constantly while the picker is working. Orders are packed in a brown bag while in the cage but the box is not sealed until sent down the line to be boxed with non controlled orders. The shipping section closes all totes with a piece of PUBLIX security tape. Once the order is completed outside the cage the invoice gets generated (computer invoice printed for the box). PUBLIX will load the totes containing controlled substances onto a short

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conveyor belt outside the controlled substances cage and have the totes travel to the loading bays via the motorized conveyor belt system, stopping for verification in the distribution area. The conveyor belt is approximately 15 ft long and is within sight of all operators. The single individual working in this area will not open any totes, but verify the label and order information on the outside of the tote against a printout. The totes are sent to the shipping department where they are sorted by route and funneled to the appropriate truck for delivery. Controlled substances totes never sit on the loading bay. Every loading bay has cameras looking into the truck as it is loaded. The firm has a full time security staff viewing the cameras at all times. This information is digitally recorded and maintained for 60 days. When the semi trailers are not being actively loaded and manned the security door will be closed and locked. The firm uses a common carrier called Courier Express and UPS. The Courier Express Company was chosen based on services provided. The company was checked for experience and the contract was reviewed by PUBLIX warehouse attorneys. When goods are delivered, all loaded boxes will have the pharmacy designated on the box. A pharmacy associate must sign for the controlled substances. PUBLIX has made all carriers aware that all shipments should be delivered directly to the pharmacy. The driver obtains a signed freight log and delivery log from pharmacy personnel. UPS also schedules pickups from the facility.

b. Controlled Substances Receiving: The firm determines orders through forecasting. Since all vendors are scheduled, the carriers must contact PUBLIX and set up an appointment for all deliveries. The appointment times are logged into the computer system and can be viewed up to one week in advance. The delivery driver will check in upon arrival at the guard shack and security will sign the individual in and issue a temporary badge. The driver proceeds to the parking area and presents ID to the security officer. The security officer verifies purchase order and calls receiving associate. There is an assigned receiving door where the carrier is sent once verification is completed. The receiving associate checks the purchase order and escorts the driver at all times. When the controlled substance is received, one of the individuals with access to the controlled substances cage is notified. PUBLIX has assigned a receiving center operator to log substances and purchase

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order information into the computer system. The computer system lists the controlled substances based on NDC number. All damaged items discovered are placed in the quarantine cage pending disposition. All received goods that are not palletized are placed in the rolling cage and transported to the control substances cage area. All palletized items are escorted to the cage immediately after processing by the receiving associate. The entire cage is inventoried daily. Once the order is verified, the invoice is stamped with the actual date received. All controlled substances are listed on a separate purchase order.

c. The firm does not distribute or receive samples of controlled substances.

d. Verification of DEA Numbers: The firm verifies the accuracy of a customer's DEA registration prior to shipping goods. The firm's computer system will not generate an invoice if the DEA registration is expired. There is a copy of the DEA registration in every store. If the number is expired, no goods will be shipped to the stores. The DEA number and expiration date are printed on each shipping invoice.

e. Loss or Theft: The firm is aware of the requirement to report any theft or loss of a controlled substance to DEA. PUBLIX policy states that the significant loss is documented as 5% of inventory. The firm does not routinely surrender controlled substances for destruction, but when necessary, MEDTURN, CLS Company, 4332 Empire Road, Fort Worth, Texas 76155, telephone 800-967-5952, is utilized.

f. Suspicious Orders: Mr. BAMBERGER understood that the firm would be responsible to report suspicious or excessive orders of controlled substances to the local DEA office. The firm's computer system sends an alert when established thresholds have been exceeded. The firm has software installed which generates orders and is programmed to establish a maximum order quantity.

g. Internal Auditing: ARCOS reportable items are reconciled monthly. Physical reconciliation of all controlled substances is completed daily. Quarterly audits are conducted by the audit department. The

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audit department is located at the corporate office in Lakeland, Florida.

h. Suppliers: The firm has no foreign suppliers or customers.

I. **INTELLIGENCE**:

The investigation disclosed no information concerning street use of legitimately manufactured controlled substances. The firm sells only to PUBLIX stores, but does have an excessive order reporting system whereby a print-out is sent to the Orlando District Office for all orders deviating by a certain percentage from normal ordering patterns.

J. **FOREIGN SUPPLIERS AND CUSTOMERS**: None.

K. **DISCREPANCIES AND DISCUSSION WITH MANAGEMENT**:

On 09-09-08, Investigators Stocum and George spoke to Mr. BAMBERGER and Ms. BRONSON about the importance of reconciling their corporate host inventory, called Marwood with the warehouse inventory computer system, called Dallas. Investigators also recommended that the firm's adjustment records, reserved and selection records be tallied on one form, rather than three separate documents. Mr. BAMBERGER and Ms. BRONSON agreed to make the changes.

L. **VERIFICATIONS**:

On 09-09-08, Investigator Linda Stocum telephoned Anthony Foust of Publix Pharmacy #133, 4870 South Apopka Vineland Road, Orlando, Florida 32819. Mr. Foust stated that he receives his III-V controlled substances from the Publix Distribution Warehouse in Orlando, Florida.

On 09-09-08, Investigator Linda Stocum telephoned Melissa McCracken-Arcas of Publix Pharmacy #1048, 1501 Meeting Place, Orlando, Florida 32814. Ms. McCracken-Arcas stated that she receives her III-V controlled substances from the Publix Distribution Warehouse in Orlando, Florida.

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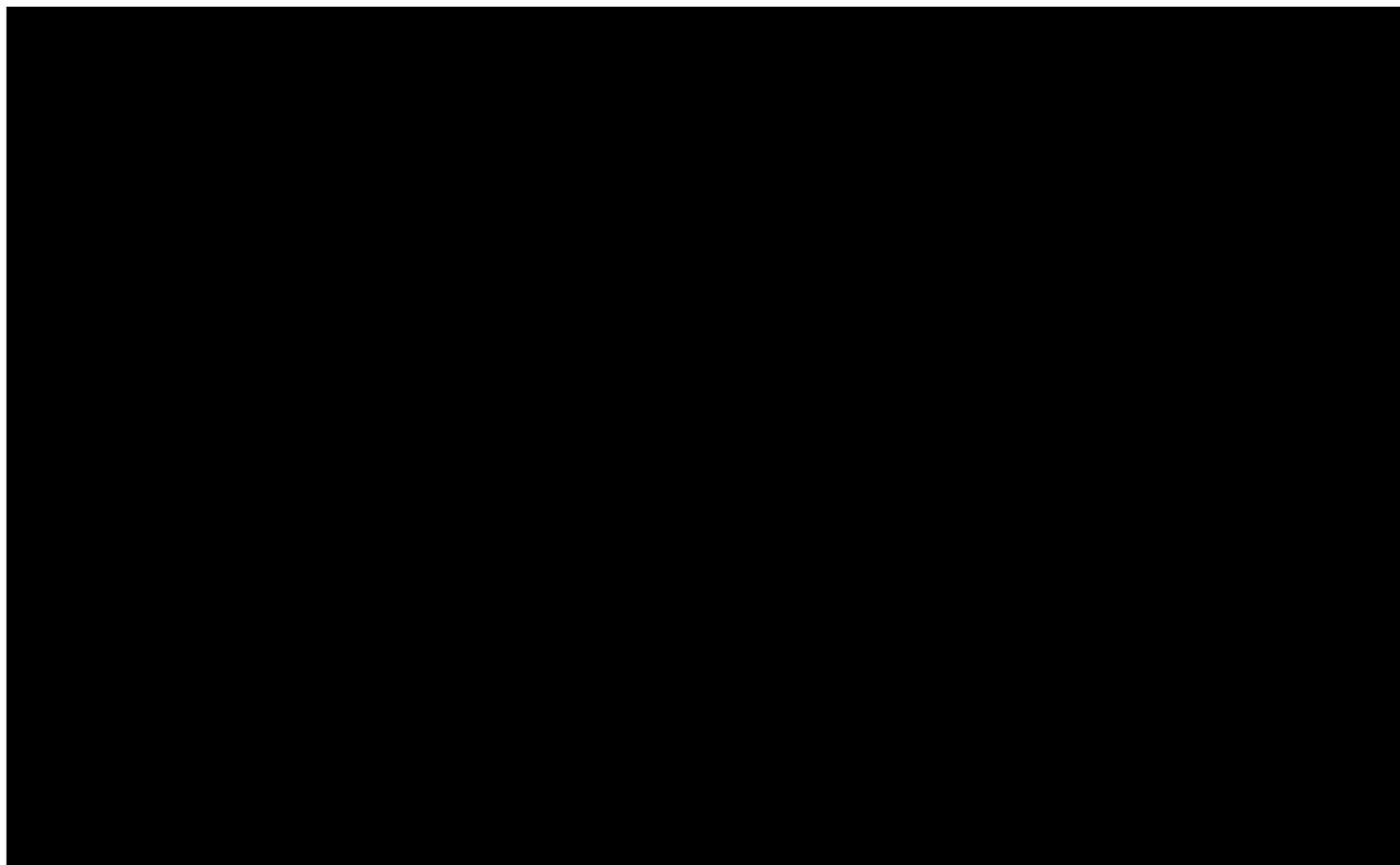
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